

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN**

CHARLES JONES, as Personal Representative
of the Estate of Wade Jones, Deceased,

Plaintiff,

v.

COUNTY OF KENT et al.

Defendants.

Case No: 1:20-cv-00036
Hon. Judge Hala Y. Jarbou
Magistrate Judge Sally J. Berens

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DEFENDANTS' PROPOSED VOIR DIRE

1. Have you or a close friend or relative ever worked in law enforcement or corrections?
 - a. If so, whom?
 - b. What is their relation to you?
 - c. Job title?
 - d. Dates of employment in the field?
2. Have you or a close friend or relative ever worked in health care?
 - a. If so, whom?
 - b. What is their relation to you?
 - c. Job title?

3. Have you or a close relative ever filed a lawsuit?
 - a. Nature of suit?
 - b. Medical malpractice?
4. Have you ever testified at a trial, deposition, grand jury, or been called as a “witness” in any capacity during any proceeding?
 - a. Type of proceeding?
 - b. Which party did you testify for?
5. Have you ever been the victim of a crime?
 - a. Type of Crime?
 - b. When?
6. Have you ever had an interest in working in law, law enforcement, corrections, security, or the military?
7. Which news station do you prefer? (Fox, CNN, HLN, MSNBC, CBS)
8. Do you use social media? If so, which do you use; Facebook, LinkedIn, Twitter, Instagram, Google Plus, etc.?
9. Please describe your level of medical knowledge.
10. Have you ever been in a management position?
11. Have you ever been treated in an Emergency Room or Hospital?
 - a. For what reason did you seek treatment?
 - b. When?
12. Has a family member or a close personal relative or friend ever had a problem with, or been treated for, chronic alcohol abuse (or alcoholism)?
 - a. If so, whom?
 - b. What is their relation to you?

- c. What was the result?
- 13. Has a family member or a close personal relative or friend ever suffered an injury because of drug or alcohol abuse?
 - a. If so, whom?
 - b. What is their relation to you?
 - c. What was the result?
- 14. Have you, a family member, or a close personal relative, as part of seeing a medical provider, ever been asked to complete a medical questionnaire or provide a medical history to the medical provider?
 - a. If so, whom?
 - b. What is their relation to you?
 - c. Were you (or they) honest in reporting the medical history?
 - d. Do you believe that it is important for you to be honest about providing a medical history?
- 15. Have you, a family member, or a close personal relative ever been given medical advice or medical instructions by a health care provider?
 - a. If so, whom?
 - b. What is their relation to you?
 - c. Did you (or they) follow the medical advice or medical instructions?
 - d. Do you (or they) believe that following medical advice or medical instructions is important? Why or why not?
- 16. What are your feelings about lawsuits against medical professionals in general?
- 17. Have you ever been dissatisfied with the treatment provided by your medical provider?
- 18. Have you or a family member ever had a bad experience with a medical provider?
- 19. Have you ever had a speeding ticket? If so, how many?
- 20. Have you or a family member ever worked in the insurance business or in any business handling insurance claims?

21. Have you ever been denied an insurance claim or insurance benefits?
22. Have you ever been involved in a dispute with an insurance company? If so, how was it resolved?
23. Have you, a family member, or a close personal friend ever been incarcerated?
 - a. What is their relation to you?
 - b. How long were they incarcerated?
24. What is your overall impression of the jail or prison system in America? Michigan?
25. What is your opinion of jail or prison healthcare and access to healthcare in America? Michigan?
26. Do you understand that the Plaintiff has the burden of proof? This means that if Plaintiff fails to prove his case, you are required to find in favor of the Defendants.
27. Any and all questions listed by the Plaintiff in his Voir Dire.

Respectfully submitted,
CHAPMAN LAW GROUP

Dated: July 18, 2022

/s/Devlin K. Scarber
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PROOF OF SERVICE

I hereby certify that on July 18, 2022, I presented the foregoing paper to the Clerk of the Court for filing and uploading to the ECF system, which will send notification of such filing to the attorneys of record listed herein and I hereby certify that I have mailed by US Postal Service the document to the involved nonparticipants.

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